

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,

Plaintiff,

v.

SOUTHERN BAPTIST CONVENTION;
GUIDEPOST SOLUTIONS LLC; and
EXECUTIVE COMMITTEE OF THE
SOUTHERN BAPTIST CONVENTION,

Defendants.

Case No. 3:23-cv-00243

Judge Richardson
Magistrate Judge Frensley

**DECLARATION OF
ANTHONY M. COLLURA
IN SUPPORT OF MOTION TO
DISMISS THE COMPLAINT**

ANTHONY M. COLLURA declares under penalty of perjury under 28 U.S.C. § 1746 that the following is true and correct:

I, Anthony M. Collura, submit this Declaration in support of the motion by Defendant Guidepost Solutions LLC (“Guidepost”) to dismiss for lack of subject matter jurisdiction or, in the alternative, for failure to state a claim and hereby state, aver, and declare the following:

1. I am the Chief Operating Officer and Chief Legal Officer of Guidepost. I am fully familiar with the facts and circumstances of Guidepost’s engagement by the Southern Baptist Convention (the “SBC”) to conduct an investigation on behalf of the SBC’s Sexual Abuse Task Force (the “SBC Task Force”).

2. As stated in the Complaint in this action, Guidepost conducted the investigation pursuant to its engagement letter with the SBC (the “Engagement Letter”) by obtaining and reviewing documents and conducting witness interviews. At the end of

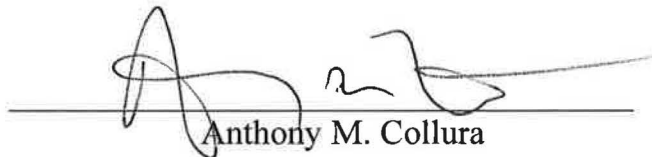
the investigation, Guidepost prepared and submitted a written report to the SBC Task Force (the "Report").

3. I am informed and understand that Plaintiff Johnny M. Hunt ("Hunt") has suggested that Guidepost published the Report to the general public. This is not accurate.

4. At the conclusion of its investigation, pursuant to the Engagement Letter Guidepost provided the Report to the SBC Task Force on or about May 15, 2022. The SBC Task Force (not Guidepost) then published the Report on the SBC Task Force website on or about May 22, 2022. The hyperlink to the website where the SBC Task Force published the Report is <https://www.sataskforce.net/updates/guidepost-solutions-report-of-the-independent-investigation>.

5. I declare under the penalty of perjury that the foregoing is true and correct.

Executed on the 2nd th day of May, 2023 at New York, New York.



Anthony M. Collura

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served through the Court's electronic filing system on the following:

Todd G. Cole, Esq. (BPR # 031078)
Andrew Goldstein, Esq. (BPR # 037042)
COLE LAW GROUP, P.C.
1648 Westgate Circle, Suite 301
Brentwood, TN 37027
Telephone: (615) 326-9059
tcole@colelawgrouppc.com
agoldstein@colelawgrouppc.com

Robert D. MacGill, Esq. (Ind. Bar. 9989-49)
Scott E. Murray, Esq. (Ind. Bar. 26885-49)
Patrick J. Sanders, Esq. (Ind. Bar. 36950-29)
MACGILL PC
156 E. Market St.
Suite 1200
Indianapolis, IN 46204
Telephone: (317) 721-1253
robert.macgill@macgilllaw.com
scott.murray@macgilllaw.com
patrick.sanders@macgilllaw.com

Counsel for Plaintiff

Scarlett Singleton Nokes, Esq.
R. Brandon Bundren, Esq.
BRADLEY ARANT BOULT CUMMINGS
LLP
1600 Division Street, Suite 700
Nashville, Tennessee 37203
Telephone: (615) 244-2582
snokes@bradley.com
bbundren@bradley.com

*Counsel for the Executive Committee of the
Southern Baptist Convention*

on this 4th day of May, 2023.

L. Gino Marchetti, Jr., Esq.
Matt C. Pietsch, Esq.
TAYLOR, PIGUE, MARCHETTI & BLAIR,
PLLC
2908 Poston Avenue
Nashville, TN 37203
Telephone: (615) 320-3225
gmarchetti@tpmblaw.com
matt@tpmblaw.com

Counsel for the Southern Baptist Convention

s/John R. Jacobson